

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
)
v.) Civil Action No. 05-11576-DPW
)
PARTNERS HEALTHCARE SYSTEM, INC.,)
)
)
Defendant.)
)

**ASSENTED-TO MOTION FOR ADMISSION OF
CHRISTOPHER KLIEFOTH AND JOSEPH H. SELBY PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), undersigned counsel hereby moves for the admission of Christopher Kliefoth and Joseph H. Selby (collectively, the “Attorneys”) *pro hac vice* to appear on behalf of Partners Healthcare System, Inc. in the above captioned case. In support of this Motion, undersigned counsel states:

1. Each of the Attorneys is a member of the bar of the highest court of a state or the bar of a United States District Court or both.
2. Each of the Attorneys is a member of the bar in good standing in every jurisdiction where he has been admitted to practice.
3. There are no disciplinary proceedings pending against any of the Attorneys as a member of the bar in any jurisdiction.
4. Each of the Attorneys is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. The certificates required by Local Rule 83.5.3(b) are attached as exhibits to this Motion.

6. Undersigned counsel is a member of the bar of this Court and has entered an appearance in this case.

7. Pursuant to the ECF Administrative Procedures Manual, a check payable to the Clerk of Court for \$100, along with a copy of the Notice of Electronic Filing of this Motion, will be delivered to the Clerk's Office within 24 hours of the filing of this motion.

8. Counsel for the United States has assented to this motion.

Respectfully Submitted,

/s/ Benjamin A. Goldberger
Benjamin A. Goldberger (BBO# 654357)
McDermott Will & Emery LLP
28 State Street
Boston, Massachusetts 02109-1775
(617) 535-4000

Attorney for Partners Healthcare System, Inc.

Dated: September 16, 2005

LOCAL RULE 7.1 CERTIFICATE OF CONSULTATION

I, Benjamin A. Goldberger, hereby certify that I conferred with counsel for each other party, and attempted in good faith to resolve or narrow the issues presented by this motion. Counsel for each other party has assented to this motion.

/s/ Benjamin A. Goldberger
Benjamin A. Goldberger

BST99 1473037-1.057158.0039

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,)
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PARTNERS HEALTHCARE SYSTEM, INC.,)
Defendant.)

CERTIFICATE OF CHRISTOPHER KLIEFOTH
IN SUPPORT OF MOTION FOR ADMISSION OF
CHRISTOPHER KLIEFOTH AND JOSEPH H. SELBY *PRO HAC VICE*

CHRISTOPHER KLIEFOTH states:

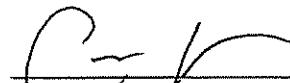
1. I am an attorney in the law firm of McDermott Will & Emery LLP, 600 13th Street, N.W., Washington, DC, 20005, Tel. 202-756-8093.
2. In accordance with Local Rule 83.5.3(b), I am submitting this certificate in support of the Motion for Admission of Christopher Kliefeth and Joseph H. Selby *pro hac vice*.
3. I am admitted to practice in the United States District Court for the District of Columbia, United States Tax Court, United States Court of Federal Claims, United States Court of Appeals (Federal Circuit, Third Circuit, Forth Circuit, Sixth Circuit, Seventh Circuit, Eleventh Circuit).
4. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice.

5. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2005.



CHRISTOPHER KLIEFOTH

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
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PARTNERS HEALTHCARE SYSTEM, INC.,)
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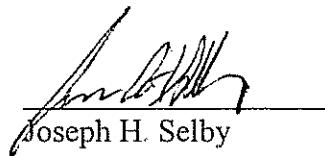
**CERTIFICATE OF JOSEPH H. SELBY IN SUPPORT OF MOTION FOR ADMISSION
OF CHRISTOPHER KLIEFOTH AND JOSEPH H. SELBY *PRO HAC VICE***

Joseph H. Selby states:

1. I am an attorney in the law firm of McDermott Will & Emery LLP, 28 State Street, Boston, MA 02109.
2. In accordance with Local Rule 83.5.3(b), I am submitting this certificate in support of the Motion for Admission of Christopher Kliefoth and Joseph H. Selby *pro hac vice*.
3. I am admitted to practice in Massachusetts and the District of Columbia.
4. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice.
5. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2005.



Joseph H. Selby